

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

EDWARD T. KENNEDY,

Plaintiff,

v.

EQUIFAX, INC., et al.

Defendants.

No. 18-cv-00214-JLS

**DEFENDANT BARBARA LOPEZ'S
MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT**

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(5), Defendant Barbara Lopez ("Lopez") hereby moves for the dismissal of Plaintiff Edward T. Kennedy's ("Kennedy") First Amended Complaint for lack of personal jurisdiction and insufficient service of process.

Lopez respectfully requests entry of an Order, substantially in the form enclosed herewith, dismissing Kennedy's First Amended Complaint as against Lopez, with prejudice. Kennedy is a serial litigant intent on abusing the civil justice system for the purposes of harassing Lopez. His claims have no basis in fact or law, and he must not be permitted to continually reiterate them at the expense of Lopez and this Court.

In support of her Motion, Lopez incorporates her Memorandum of Law contemporaneously filed herewith in its entirety.

Respectfully submitted,

By: /s/ Joshua Upin

Dated: October 23, 2018

Joshua Upin, Esquire

Matthew Faranda-Diedrich, Esquire

Alexander J. Nassar, Esquire

PA Id. Nos. 308459/203541/313539

ROYER COOPER COHEN BRAUNFELD LLC

Two Logan Square

100 N. 18th St., Suite 710

Philadelphia, PA 19103

Attorneys for Defendant Barbara Lopez